



# SIERRA CLUB

December 14, 2020

*Via electronic delivery*

The Honorable Jocelyn Boyd  
Chief Clerk/Executive Director  
The Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

**Re: Application of Dominion Energy South Carolina, Incorporated for Adjustment of  
Rates and Charges  
Docket No. 2020-125-E  
Sierra Club's Sixth Set of Data Requests**

Dear Ms. Boyd,

On behalf of Robert Guild, please find enclosed for filing in the above-referenced case Sierra Club's sixth set of data requests. This request was filed today via the South Carolina Public Service Commission Case E-Filing System. As indicated on the Certificate of Service, I am serving all parties of record via electronic mail.

Please contact me with any questions.

Sincerely,



on behalf of

Robert Guild  
S.C. Bar No. 2358  
314 Pall Mall Street  
Columbia, SC 29201  
(803) 916-5738  
bguild@mindspring.com

Enclosure

cc: Certificate of Service

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2020-125-E**

In re:

Application of Dominion Energy South  
Carolina, Incorporated for Adjustment  
of Rates and Charges (See Commission  
Order No.2020-313)

**SIERRA CLUB’S SIXTH SET OF  
DATA REQUESTS  
December 14, 2020**

Pursuant to R.103-833 of the South Carolina Code of Regulations, Intervenor Sierra Club, by and through undersigned counsel, serves the following data requests on Dominion Energy South Carolina, Inc. (“Dominion” or the “Company”) in the above referenced docket. These requests are continuing in nature to the extent permitted by the rules of the South Carolina Public Service Commission and the South Carolina Rules of Civil Procedure.

**INSTRUCTIONS**

1. These requests should be regarded as continuing. If, after filing its initial response to the interrogatories and requests, the Company becomes aware of any information that would alter or amend any responses, please provide updated responses as additional information becomes available.
2. If a response to any of the attached requests requires any calculations, analyses, assumptions, or studies, please identify and provide copies of such calculations, analyses, assumptions, or studies—including all work papers relating thereto. For any analyses or calculations prepared

using electronic workbooks, please provide operational versions of those spreadsheets as well as all operational versions of all supporting workbooks used to develop inputs.

3. Produced documents should include originals and all other copies which are not absolutely identical as well as all drafts and notes (whether typed, handwritten or otherwise) made or prepared in connection with such documents, whether used or not.
4. With respect to requests for analyses or calculations that were prepared using electronic workbooks, please provide operational versions of those spreadsheets (i.e., with calculations active) as well as all operational versions of all supporting workbooks used to develop inputs.
5. Unless otherwise specified, all requests for documents herein pertain to the Company's South Carolina operations. Please ensure that all responses are specific to the Company's South Carolina service territory. Where South Carolina-specific data are not available, please provide an appropriate factor, method or percentage to allow for an accurate estimate of South Carolina-specific data to be performed.
6. If you consider any document to be privileged or protected from production, then you must:
  - (i) include in your response a list of documents withheld from production, (ii) identify each document by date, addressee, author, title and subject matter, (iii) identify those persons who have seen the document or who were sent copies, and (iv) state the ground(s) upon which each such document is considered privileged or protected.
7. Due to the current COVID-19 situation and most people working remotely, please deliver all responses to the following interrogatories and requests for production of documents **electronically** to:

Robert Guild  
[bguild@mindspring.com](mailto:bguild@mindspring.com)

Dorothy E. Jaffe  
[dori.jaffe@sierraclub.org](mailto:dori.jaffe@sierraclub.org)

### **DEFINITIONS**

1. The “Company” is defined to include both the Dominion Energy South Carolina, Inc. and any consultants or other agents that assisted in the development or preparation of the plan for electric distribution grid transformation projects.
2. “Communications” shall mean all oral communications and all written communications, including all “documents,” as defined below.
3. “Describe” means to state in detail each and every basis for the position taken or the statement made in response to the request and includes identifying each and every statement or document relied on and provide a copy of all such identified documents.
4. “Document” is defined to include all materials, of any kind or description, in any medium, regardless of where or how maintained or accessed (such as in or through official work or personal files, accounts, or devices). Documents include, by way of illustration only, correspondences, papers (including working papers), electronic mail (including any attachments), telegrams, facsimiles, notes, sound or video recordings, voice mail, minutes, memoranda, inter- or intra-office communications, diaries, daily logs, records, reports, studies, estimates, surveys, written forecasts, analyses, contracts, licenses, agreements, charts, graphs, indexes, database or other electronic records, statistical records, data sheets, data processing cards, computer printouts, computer discs, videotapes, motion pictures, agendas, meeting invitations, websites, intranet pages, and other electronic communications,

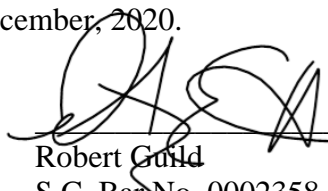
any notes or drafts relating to any of the foregoing, and any other documents of any kind in your possession, custody or control or to which you have access or known to exist..

5. “Identify,” “identification,” as used with respect to a person means to state the person’s full name and present address and his present or last known employment position and business affiliation if a natural person, and corporate or other status and address if not a natural person. “Identify” or “identity” when used in reference to a document means to state the following as to each document:
  - a. Its nature and contents;
  - b. Its date;
  - c. The date it was executed if different from the date it bears;
  - d. The name, address and position of its author or signer;
  - e. The name, address and position of its addressee, if any;
  - f. Its present location and the name, present address and position of the person or persons having present custody; and
  - g. Whether it has been destroyed, and if so, with regard to such destruction; (i) the date of destruction; (ii) the reason for destruction; and (iii) the identity of the person who destroyed the document.
6. “Including” means “including but not limited to.”
7. “Person” includes any individual, sole proprietorship, partnership, corporation, association, trust, statutory trust, joint venture, or other entity.
8. “You” or “your” means Dominion Energy South Carolina and its agents, employees, representatives, attorneys, experts, investigators, insurers, consultants, or anyone acting on behalf of Dominion Energy South Carolina.

**DATA REQUESTS**

**Request No. 6-1.** Please provide copies of all source documents, cited documents listed in footnotes, workpapers and other sources used in the development of and in preparation and support of the Rebuttal Testimony of Henry E. Delk, Keller Kissam, and James Neely. This includes all Excel workpapers in live format with all formulas intact, all other workpapers and source documents of any type used to support the rebuttal testimony of the named individuals. Please ensure that if there are any referenced spreadsheets that those are also provided.

Respectfully submitted this 14<sup>th</sup> day of December, 2020.

 on behalf of  
Robert Guild  
S.C. Bar No. 0002358  
314 Pall Mall Street  
Columbia, SC 29201  
(803) 917-5738  
bguild@mindspring.com

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2020-125-E**

In re:

Application of Dominion Energy South  
 Carolina, Incorporated for Adjustment  
 of Rates and Charges (See Commission  
 Order No.2020-313)

**CERTIFICATE OF SERVICE**

I hereby certify that I have served the persons listed on the official service list for Docket No. 2020-125-E, listed below, a copy of the Sierra Club's Sixth Set of Data Requests via electronic mail on this day, December 14, 2020.

Adam Protheroe, adam@scjustice.org

Stephanie Easton, seaton@spilmanlaw.com

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Robert Guild

On behalf of